

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:22-CR-00378-N

v.

RAYNALDO RIVERA ORTIZ JR.

**GOVERNMENT'S NOTICE OF INTENT TO OFFER EVIDENCE  
PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

Pursuant to Federal Rule of Evidence 902(11), the United States of America (the government) files notice of its intent to offer the following business records by affidavit, certificate, and/or declaration of the respective institution's custodian of records, as described and set forth below:

<b>Description of business records</b>	<b>Description of affidavit, certificate, or declaration</b>	<b>Location of affidavit in government discovery; location of respective business records</b>
Financial account records, JPMorgan Chase Bank, N.A.,	Tykeisha Washington (JPMorgan Chase), November 30, 2022	GOV_00008723 (pages 2-5 of placeholder file in native format); GOV_00008723 (subsequent pages of placeholder file in native format)
Financial account records, JPMorgan Chase Bank, N.A.	Kaye Sutton (JPMorgan Chase), December 30, 2022	GOV_00008725 – GOV_00008726; GOV_00008727 – GOV_00008782

Financial account records, JPMorgan Chase Bank, N.A.,	Kavya Shekar (JPMorgan Chase), November 22, 2022	GOV_00009213 (pages 2-3 of placeholder file in native format); GOV_00009213 (subsequent pages of placeholder file in native format)
Financial account records, JPMorgan Chase Bank, N.A.,	Tammy Tatum (JPMorgan Chase), November 2, 2022	GOV_00036988 – GOV_00036989; GOV_00036990 – GOV_00037161
Financial account records, JPMorgan Chase Bank, N.A.	Kaye Sutton (JPMorgan Chase), February 3, 2023	GOV_00037163 – GOV_00037165; GOV_00037166 - GOV_00037560
Financial account records, American Express	Donna Lund (American Express), January 25, 2023	GOV_00036798; GOV_00034556 – GOV_00036795
Financial account records, Bank of America, N.A.,	Alexis Wilks (Bank of America), November 29, 2022	GOV_00008959; GOV_00008783 – GOV_00008958
Financial account records, Bank of America, N.A.	Alexis Wilks (Bank of America), February 28, 2023	GOV_00037565; GOV_00037566 – GOV_00037783

As set forth above, the records and their respective certifications have been made available to the defendant. Because the government has satisfied all the requirements of Rule 902(11), the government respectfully requests that the Court reject any hearsay and/or authentication objections to the records.

Respectfully submitted,

LEIGHA SIMONTON  
UNITED STATES ATTORNEY

s/ John J. de la Garza III

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**Certificate Of Service**

I certify that a copy of this pleading was served on counsel for the defendant via ECF on the 7<sup>th</sup> day of December, 2023.

s/ John J. de la Garza III

John J. de la Garza III  
Assistant United States Attorney